

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>GDC TECHNICS, LTD.,</b> <i>Plaintiff,</i>	§ § § § § § § §	<b>v.</b>  <b>JAMES ROGER GRACE and</b> <b>J.R.G. DESIGN, INC.,</b> <i>Defendants.</i>	§ § § § § § § §	<b>CIVIL ACTION NO. 5:15-CV-00488-RP</b>
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**OPPOSED MOTION TO WITHDRAW AS DEFENDANTS' COUNSEL**

COME NOW Movants, The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek, who bring this Opposed Motion to Withdraw as Defendants' Counsel. Movants request permission to withdraw from representing Defendants in this matter, and in support thereof, would show the Court as follows:

1. In the Fifth Circuit, “[a]n attorney may withdraw from representation . . . upon leave of the court and a showing of good cause and reasonable notice to the client. The withdrawal of an attorney in a given case is a matter entrusted to the sound discretion of the court . . . .” *Williams v. Huntington Ingalls, Inc.*, 488 F. App'x 864, 866 (5th Cir. 2012) (quoting *Matter of Wynn*, 889 F.2d 644, 646 (5th Cir. 1988) (alteration in original)).
2. Good cause exists for withdrawal of Movants as counsel in that Defendants have failed to fulfill their obligations regarding Counsel's services. Reasonable warning has been given by Counsel to Defendants that Counsel would withdraw unless Defendants' obligations are fulfilled. Remaining in the case would impose an undue financial burden on Counsel.
3. Counsel has delivered a copy of this Motion to Defendants and has notified them in writing of their right to object. As of the filing of this motion, Defendants' signature could not be obtained but Defendants understand Counsel's intent to withdraw.

4. This withdrawal is not sought for purposes of delay but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Movants pray that the Court enter an order permitting The Snell Law Firm, P.L.L.C. and Jason W. Snell and John Robert Skrabanek to withdraw as counsel for Defendants.

Respectfully submitted,

THE SNELL LAW FIRM, P.L.L.C.

BY: /s/ Jason W. Snell  
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ATTORNEYS FOR DEFENDANTS, JAMES  
ROGER GRACE and J.R.G. DESIGN, INC.

### **CERTIFICATE OF CONFERENCE**

The undersigned certifies that Defendants' counsel has conferred in good faith with Plaintiff's counsel and Plaintiff's counsel is opposed to the relief requested in this motion.

/s/ Jason W. Snell  
Jason W. Snell

### **CERTIFICATE OF SERVICE**

I certify that on the 4<sup>th</sup> day of January 2017, I caused the foregoing document to be electronically filed with the Clerk of the Court pursuant to the Electronic Filing Procedures and using the CM/ECF system, and that a true and correct electronic copy was thereby caused to be served on Plaintiff by and through their counsel of record.

/s/ Jason W. Snell  
Jason W. Snell